

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

FILE UNDER SEAL

UNITED STATES OF AMERICA)

v.)

No. 10-cr-694-RWT

LAUREN STEVENS,)

Defendant.)
_____)

**DEFENDANT'S MOTION FOR DISCLOSURE OF THE GOVERNMENT'S
PRESENTATION TO THE GRAND JURY RELATING
TO THE ADVICE OF COUNSEL DEFENSE AND 18 U.S.C. § 1515(c)**

Pursuant to Federal Rule of Criminal Procedure 6(e)(3)(E)(ii), Defendant Lauren Stevens, through counsel, respectfully requests that the Court order disclosure of the grand jury transcripts so that Ms. Stevens and the Court may determine whether grounds exist to dismiss the Indictment because of a failure to properly instruct the grand jury and present critical exculpatory evidence relating to the advice of counsel defense and related statutory defense under 18 U.S.C. § 1515(c). In the alternative, Ms. Stevens respectfully requests that the Court order that such portions of the grand jury transcripts be produced for the Court's *in camera* inspection, so that the Court may determine whether grounds exist for disclosure to the defense.

Defense counsel has conferred with the government regarding the relief requested herein, and government counsel has declined to consent to such relief.

Ms. Stevens respectfully requests oral argument on the motion. A proposed Order is attached.

Respectfully submitted,

Dated: December 17, 2010

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